



RIKKYO SCHOOL STAFF BEHAVIOUR POLICY

This document provides a guide for adults working and volunteering in our school regarding acceptable and desirable conduct to safeguard children.

Policy agreed (date):	1 st September 2024
Policy published (including on website) (date):	1 st September 2024
Next review (date):	1 st September 2025

Key Personnel			
Role	Name	Tel.	Email
Headmaster	Mr Okano		
Designated Safeguarding Lead (DSL) and Head of Student Services (Boarding and Pastoral Care)	Mr Okuno		
Deputy DSL (DDSL) – Senior Mental Health and Prevent Lead	Ms M Brown		
Deputy DSL (DDSL) and Designated Teacher for Children Looked After	Mrs Mc Allister		
Nominated Governor for Safeguarding	Mrs Bunday		
Chair of Governors	Mr Sugiyama		

The key safeguarding responsibilities within each of the roles above are set out in Keeping Children Safe in Education 2024.

If you believe a child has suffered or is likely to suffer significant harm, Children's Social Care must be contacted immediately:

Children's Social Care referrals:

Integrated Front Door/Out of Hours: 01403 229900

West Sussex Local Authority Designated Officer (LADO): 0330 222 6450

If you believe a child is at immediate risk of significant harm or injury, you must call the emergency services on 999.

Introduction

Rikkyo School is committed to providing positive academic, social and emotional outcomes for our children, underpinned by a strong safeguarding ethos. We are equally committed to the welfare of our staff, who are expected to adhere to the highest standards of professional behaviour to maintain confidence and respect of the general public and colleagues.

The Trustees and Governors will make sure that this policy reflects national and local requirements to protect and support the children and adults in our school.

We will fulfil our local and national responsibilities as laid out in the following key documents:

- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (2024)
- The procedures of Safeguarding Vulnerable People Partnership (SVPP)

This policy:

- is based on the Guidance for Safer Working Practice for those working with children and young people in education settings (2022);
- aims to provide a guide for adults about acceptable and desirable conduct to ensure that staff maintain safe working practice and so safeguard both children and adults;
- does not provide a complete checklist of appropriate behaviour for staff in every circumstance. Staff must make judgements about their behaviour to secure the best interests and welfare of the children in their charge and, in so doing, will be seen to be acting reasonably.

This policy details the standards, values and expectations for appropriate behaviour in the workplace, and in particular for an employee's and volunteer's obligation to contribute to a safe and pleasant work environment that is free from discrimination, bullying and harassment.

In *very exceptional* circumstances where a member of staff believes it is the best interest of a child to breach these guidelines, that person **must** tell the Headmaster of the justification for any proposed, or action already taken, at the earliest opportunity. The Headmaster will make a written record of that discussion including any areas of disagreement and actions taken.

Additional comments for boarding staff: Rikkyo School's Staff Behaviour Policy applies to all employees and volunteers; however, within the boarding conduct context the following areas are highlighted as being of particular significance:

- Boarding staff have a responsibility to Rikkyo School to fulfil their duties as outlined in their job specifications in addition to any other reasonable requests made to them by the Headmaster via any of his Deputy Heads
- Boarding staff should conduct themselves as a role model to the students under their care and approach their duties and responsibilities in a positive and friendly manner.
- Boarding staff must be aware that students may be particularly vulnerable in a residential setting.

Scope

This policy is consistent with all other policies adopted by the governors and should be read alongside the **Child Protection and Safeguarding policy and the Staff Code of Conduct** as well as the following documents relevant to the safety and welfare of our children:

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|----------------------------|-------------------------|--------------------------|
| • Behaviour policy | • SEND policy | • Online/e-safety policy |
| • Health and safety policy | • Whistleblowing policy | • Complaints policy |

This policy applies to all staff and volunteers working at our school.

For the purposes of this policy:

- 'Staff' refers to all those working for the school, full time or part time, on a temporary basis, or permanent, in a paid or regular voluntary capacity.
- A 'volunteer' is a person who performs an activity that involves spending time, unpaid in this school (except for approved expenses).
- A 'position of trust' is one in which one party is in a position of power or influence over another, due to their work or the nature of their activity.
- 'Child' refers to all children up to the age of 18. All adults are in positions of trust in relation to every child at our school.

Rikkyo School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential

It does not apply to employees of external contractors and providers of services (e.g. contract cleaners). Such staff are covered by the relevant Code of Conduct of their employing body.

Expectations

All staff:

- are familiar with this policy and have an opportunity to contribute to its review;
- understand their responsibilities to safeguard and promote the welfare of children;
- are aware that failure to meet the standards of behaviour and conduct in this policy may result in disciplinary action. This includes dismissal, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity.

Mandatory Procedures

Confidentiality

The sorting and processing of personal information is governed by GDPR (General Data Protection Regulations 2018) - see Data Protection Policy September 2024.

Child records are shared with those who have a professional need to see them. When staff have access to confidential information about colleagues, children or their parents/carers, the staff must treat such information in a sensitive and confidential way, sharing it only in the interests of a child and when legally permitted to do so.

Governors and Trustees should not routinely access child records. Exceptions to this would be for the purpose of an investigation in line with the School's complaint policy and procedures.

Staff, Governors and Trustees will not use their position to gain access to information for their own advantage and/or a child's or family's detriment.

If a member of staff is concerned that a child is being abused, is at risk of being abused or may have been abused in the past, they will follow the agreed procedure set out in the flowchart 'What to do if you are worried about a child', displayed in the staff room. See Safeguarding and Child Protection Policy (September 2024).

If a member of staff is ever in any doubt about whether to share information or not, they should get advice from the Designated Safeguarding Lead (DSL).

This means that staff should:

- be clear about when information can be shared and in what circumstances it is appropriate to do so;
- treat information they receive about students in a discreet and confidential manner;
- seek advice from a senior member of staff if they are in any doubt about sharing information they hold, or which has been requested of them;
- know who any concerns or allegations should be reported.

Staff relationships with children and parents

All staff know that:

- they are in positions of trust in relation to all children on roll. They ensure that the power imbalance is never used for personal advantage or gratification. They avoid behaviour which might be interpreted by others as an abuse of the position of trust and report any incident with this potential to the manager. This includes sharing personal contact details with children or families.
- they have a legal duty to protect the interests of children and accept the obligations inherent in that responsibility;
- it is important that they determine how best to build trusted relationships with children and young people which facilitate communication, using professional curiosity and speaking to the DSL if they have concerns about a child;
- they must not establish or seek to establish social contact with children to secure a friendship or to pursue or strengthen a relationship;

- they must inform the Headmaster of any pre-existing (prior to the member of staff or child starting at the school) or new relationship with a child or close family member, which they feel, might compromise the school or their own professional standing;
- they should disclose any relationship or association (in the real world or online) that may impact on the school's ability to safeguard students;
- it is an offence (Sexual Offences Act 2003) for a member of staff in a position of trust to engage in **any** form of sexual activity with a child under the age of 18.

Certain behaviours are at odds with a position of trust. These include, but are not limited to:

- harassment or discrimination based on any characteristic protected by the Equality Act 2010.
- loss of personal civility including, personal attacks or insults, displays of temper (such as throwing objects), unwanted physical contact (pushing, shoving, hitting) or the threat of the same.
- Staff must not swear, blaspheme or use offensive language in front of students, nor use language which is discriminatory and demeaning in any way.

Such behaviours are disciplinary offences and may be referred to Local Authority and/or the police.

Communication with children and parents, including social contact outside of the workplace

Staff must use their professional judgement when requesting or accepting any social contact (including through social media). This means that they must:

- not accept any request from students for contact via any social media platform;
- make a judgement about whether to maintain the connection in any cases where contacts were made before the child started at the school (e.g. teacher being friend with a parent). Staff must discuss any decision to maintain such contact with the Headmaster.

We acknowledge that staff may have friendships and social contact with parents of children outside of school. Staff will not engage in conduct outside work that could damage their professional reputation or the reputation of the school community.

Any contact between staff and children and/or parents that is deemed to bring the School into disrepute or that might lead a reasonable person to question the staff member's motivation, or intentions will always be investigated and could lead to disciplinary action.

Staff must not make sexual innuendos or any comments of a sexual nature to any pupil (other than in the context of sex and relationship education in the PSHE curriculum), nor make any comments trivialising alcohol or drug abuse.

Occasionally, students may develop an infatuation for a member of staff. In such situations, the advice of the Headmaster/Deputy Headmaster must be sought. Staff should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is beyond reproach.

Staff must inform the Headmaster of any proposed or pre-existing arrangements between them and the families of children on roll that take place outside school e.g. baby-sitting, sports coaching, music tuition. Staff are advised to wait until after an ex-pupil's 18th birthday before accepting any request on social media.

Infatuations: Occasionally, students may develop an infatuation for a member of staff. Any unplanned contact of this nature or suspected infatuations or "crushes" will be reported to the Headmaster. Staff are not to disclose their personal telephone numbers, email address and so on to students. Staff are required to deal sensitively with these situations and to maintain the dignity and safety of all concerned. Such situations carry a high risk of words or actions being misinterpreted and they must ensure that their own behaviour is beyond reproach. A member of staff who becomes aware that a child or young person is developing an infatuation must discuss this with their senior manager and alert the Headmaster at the earliest opportunity so that appropriate action can be taken to avoid any hurt, distress or embarrassment from the child, family or staff's perspective. If staff have similar concerns regarding parents, then this should also be passed onto the Headmaster. *Concerns about the welfare of colleagues or children should be communicated to the Headmaster immediately.*

Making professional judgements: There will be rare occasions and circumstances in which staff have to make decisions or take action in the best interest of a pupil, which could contravene existing guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the students in

their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a member of the senior leadership team. Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably. Staff should:

- discuss the circumstances that informed their action, or their proposed action, with their line manager or, where appropriate, the school's designated safeguarding lead. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted;
- always discuss any misunderstanding, accidents or threats with the Headmaster or DSL
- always record discussions and actions taken with their justifications;
- record any areas of disagreement and, if necessary, refer to another agency/the LA/Ofsted/TRA/other Regulatory Body.

Gifts, rewards, favouritism and exclusion

Staff must:

- declare any gift they receive from a parent or child. This does not include small tokens of appreciation such as at Christmas or the end of the year;
- not give gifts to individual children. Any rewards or treats will be given only as part of the School's agreed behaviour (or other relevant) policy;
- advise the Headmaster about the offer of any gift or hospitality, from outside or inside the school, which might be interpreted as an attempt to influence staff conduct towards children, parents or other employees.

Physical contact including intimate/personal care and behaviour management

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child, in one set of circumstances, may be inappropriate in another, or with a different child. Any physical contact will be in response to the child's needs, of limited duration and appropriate to their age, stage of development, gender, background and any agreed support or care plan.

The use of physical intervention including the use of reasonable force will always be in line with the following policies (Special Needs policy (September 2024), Supporting children with medical needs policy (September 2024), Behaviour policy (September 2024), Physical Intervention policy/procedures (September 2024).

Staff understand that:

- on a daily basis, it may be entirely appropriate and proper for staff to have physical contact with children and that they do so in ways appropriate to their professional role and in relation to the child's individual needs;
- some children are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Whenever possible, adults seek the child's permission before initiating contact and are sensitive to any signs that the child may be uncomfortable or embarrassed;
- they have a responsibility to ensure the way they offer comfort to a distressed child is age appropriate;
- they must never touch a child in a way which may represent a misuse of authority or considered indecent;
- physical contact must never be secretive, or for the gratification of the adult;
- they should be aware of cultural or religious views about touching and be sensitive to the issues of gender.

A 'no touch' approach is impractical for most staff and will in some circumstances be inappropriate. When physical contact is made with students this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible in the school's incident book and, if appropriate, a copy placed on the child's file.

Staff should listen, observe and take note of the child's reaction or feelings and – so far as is possible - use a level of contact and/or form of communication which is acceptable to the child for the minimum time necessary. The general culture of 'limited touch' should be adapted, where appropriate, to the individual requirements of each pupil. Students with special needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny.

It is recognised that some students may seek inappropriate physical contact. It is the responsibility of the staff member to sensitively deter the pupil and help them understand the importance of personal boundaries. Such circumstances must always be reported and discussed with a senior manager and the parent/ carer.

Some staff working in certain settings, for example sports, drama or outdoor activities or teach specific subjects such as PE or music, will have to initiate some physical contact with students, for example to demonstrate technique in the use of a particular piece of equipment, adjust posture, or perhaps to support a pupil so they can perform an activity safely or prevent injury. Such activities should be carried out in accordance with existing codes of conduct, regulations and best practice. Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment i.e., one easily observed by others and last for the minimum time necessary. This means that staff should:

- *treat children with dignity and respect and avoid contact with intimate parts of the body;*
- *always explain to a child the reason why contact is necessary and what form that contact will take;*
- *consider alternatives, where it is anticipated that a pupil might misinterpret any such contact;*
- *be familiar with and follow recommended guidance and protocols;*
- *conduct activities where they can be seen by others;*
- *be aware of gender, cultural or religious issues that may need to be considered prior to initiating physical contact.*
- *have up to date guidance and protocols on appropriate physical contact in place that promote safe practice and include clear expectations of behaviour and conduct;*
- *ensure that staff are made aware of this guidance and that safe practice is continually promoted through supervision and training.*

If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances will be immediately reported to the Headmaster/DSL and recorded in writing. If appropriate, the Headmaster will consult with the Local Authority Designated Officer for allegations (LADO).

Staff understand that a child who has suffered previous abuse or neglect may associate physical contact with such experiences. They recognise that such a child may seek out inappropriate physical contact and know to deter the child sensitively to help them to understand the importance of personal boundaries. Staff know that they must never indulge in play that involves rough-and-tumble or fun fights.

Children with disabilities may require more physical contact to assist their everyday learning. The arrangements are understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny. Staff always allow/encourage children, where able, to undertake self-care tasks independently.

If a child's behaviour presents a serious risk to themselves or others, a robust risk assessment and, where relevant, a physical intervention plan is always put in place and reviewed regularly. In all cases where physical intervention takes place, staff record the incident and subsequent actions and report these in line with the school's behaviour and safeguarding policies.

First aid

Staff adhere to the school health and safety policy, the policy for supporting students with medical conditions and for administering first aid or medication.

One to one situations

Staff carefully consider the welfare needs of children when with them in a one-to-one situation. All spaces in the school are set up to allow any activity to be easily observed by other staff in the school. Windows and doors are kept clear from display materials to allow rooms to be overlooked. Internal doors remain open when practicable. See school lone working procedures/policy (September 2024).

Children are provided with age/developmentally appropriate advice about managing distressing feelings that may arise during 1-1 situations in school. Staff will record any time a child has appeared upset/angry during a 1-1 session and will report this to their line manager.

To avoid misunderstandings the following should be adhered to carefully:

- Members of staff should exercise particular caution and sensitivity before visiting lavatories or changing areas. Male members of staff should never be in girls' changing areas unless accompanied by a female member of staff and likewise for female staff and boys changing rooms;

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- No member of staff should ever be behind a locked door with a child;
- Ensure that unnecessary contact with children is avoided (e.g. children sitting on laps or hair stroking etc.) and that outward displays of affection are only appropriate in the case of comforting a distressed child, and should never occur unless there is another adult present;
 - Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation;
- Staff should take great care that relationships with individual children are kept on a professional level. It is important that all children are treated the same and that discipline is fair, consistent and impartial. Staff should take care that "joking comments" cannot be misconstrued to give offence;
- Staff must not be party to gossip about colleagues or children;
- Personal or academic information on children should be kept confidential and away from other children or parents;
- The highest level of confidentiality should always be maintained in relationships with both adults and children. Staff, however, should make it clear that there are certain circumstances (e.g. where a child is suffering or is likely to suffer harm) when other people will need to be told, so that the community or the child can be protected. If a child asks to tell a member of staff something in confidence, they should always be told that this will depend upon the circumstances and absolute confidence cannot be guaranteed;
- If a child behaves inappropriately or makes an inappropriate advance to a member of staff, it is essential that the child is immediately informed that the language or behaviour is unacceptable. The incident, and what has been done and said, should be recorded, and reported to the Designated Safeguarding Lead immediately;
- One-to-one meetings should, wherever possible, take place in public or semi-public places, such as classrooms or offices. If in classrooms, ensure you are seated so that you and the child can be seen through the visibility panel in the door;
- When in a private meeting with a child or one-to-one session, as occurs with Therapists, ensure furniture is positioned to allow easy access into or out of the room and that the glass panel in the door is not obscured so that you can be seen clearly;
- Staff will at no time travel unaccompanied outside of the school with children;
- Inform another adult of where the 1:1 teaching is taking place;
- Staff should ensure that a meeting is arranged during normal school hours when there are plenty of other people about;
- Do not continue a meeting for any longer than is necessary to achieve its purpose;
- Avoid sitting or standing in close proximity to a pupil, except as necessary to check work;
- Avoid using "engaged" or equivalent signs on doors or windows;
- Avoid idle discussion;
- Avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact;
- Avoid any conduct that could be taken as a sexual advance;
- Report any incident that causes you concern to the Designated Safeguarding Lead in accordance with the school's Child Protection Policy, and make a written record (signed and dated);
- Report any situation where a pupil becomes distressed or angry to the DSL.

Punishments that are humiliating or degrading must not be used.

The following sanctions / punishments will *never* be used: -

- any form of hitting of a child (including hitting a child in anger or retaliation);
- deprivation of food or drink;
- enforced eating or drinking;
- prevention of contact to parents or any appropriate independent listener or helpline by telephone;
- requirement to wear distinctive clothing or the wearing of nightclothes by day;
- withholding of any aids or equipment needed by a child.

Home visits and transporting children See school lone working procedures/policy (September 2024). All work with children and parents/carers is whenever possible undertaken in the school. There are however occasions where it may be necessary to arrange a home visit e.g. as part of child's induction programme, during changes in operating practice due to a pandemic.

In such situations, these activities will only be undertaken with the knowledge and consent of senior leadership and parents/carers (unless there is a good reason not to, e.g. safeguarding concern). Where possible staff will work in pairs. A risk assessment will be undertaken and school will ensure staff understand the purpose and limitations of their home visit. Any member of staff transporting a child in their own vehicle will:

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- have prior written permission from parents and the school Headmaster;
- have the appropriate vehicle insurance for business use;
- have the correct ratio of children/adults;
- ensure that all passengers wear seat belts;
- ensure booster seats are used according to the current legislation.

Educational Visits and After-School Activities

Staff remain in a position of trust during school activities that take place off the school site or out of school hours and so, they will ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

Organisers will conduct risk assessments and adhere to Health and Safety guidelines. Staff/child ratios will be specified and where overnight stays are involved, and the composition of groups of children and the supervising staff will be carefully planned to keep all children and staff safe.

Where out of school activities include overnight stays, careful consideration will be given to sleeping arrangements as part of the planning process. Children, staff and parents will be informed of these arrangements prior to the start of the trip and any proposed changes to the plans will be agreed with senior staff in the school in advance. Staff will not smoke or consume alcohol on any school trip.

Health and Safety arrangements require members of staff to keep colleagues aware of their whereabouts, during an out of school activity. This means staff will always have another adult present in out of school activities, unless otherwise agreed with senior staff in the school.

Staff appearance (Also applies to online and virtual teaching)

Staff must dress smartly, in clothing appropriate to the role, compliant with professional standards and not likely to be viewed as offensive, revealing or sexually provocative. It should not distract, cause embarrassment or give rise to misunderstanding. Political slogans must be avoided.

Any staff with tattoos that might be viewed as offensive, provocative or likely to give rise to misunderstanding must ensure those tattoos always remain covered when that adult is working for the school.

The acceptable use of technologies

Staff must not engage in inappropriate use of social network sites which may bring themselves, the school, school community or employer into disrepute. Staff should ensure that they adopt suitably high security settings on any personal profiles they may have. Staff must be circumspect in their use of **all** social media or any other web-based presence that they may have, including written content, videos or photographs, and views expressed directly or by association with websites/pages or posts established by others (e.g. 'liking', reposting or forwarding). This includes the use of dating websites where staff could encounter parents or students either with their own profile or acting covertly.

They must consider the long-term implications of any content published by them online, specifically how it might ever have an adverse effect:

- on their reputation as an individual working in an education setting;
- their ability to maintain good professional boundaries with parents and with children;
- on the reputation of the school.

Staff must not access any content from the internet on personal device during school hours, on the school site, or on a school computer or device at any time that could bring the school into disrepute or that might lead a reasonable person to question the staff member's motivation or intentions

All staff are aware of their part in ensuring the DFE Filtering and monitoring standards and cyber security standards are upheld. If staff become aware of misuse by another member of staff (in or out of school), they must report those concerns using the concerns and allegations against staff (including supply teachers, third-party & self-employed staff, volunteers, contractors) procedures. These procedures now include adults from organisations or individuals using school premises procedures.

Exceptional operating circumstances

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If the school is required to change the way we offer our provision to children due to exceptional circumstances e.g. during a pandemic lockdown, staff safeguarding responsibilities to children will continue to apply, in line with the safeguarding policy. The DSL will ensure staff, children, and families are provided with written:

- temporary changes to procedures for working with children e.g. online.
- timescales for such changes so that all children, families and staff understand when such arrangements will end, and arrangements revert to those in place prior to the events leading to the need for the temporary changes.

Photography and recording

Staff are not permitted to use their phones, cameras, smart technology, or any device that can be used for photographing or recording children, when on duty for any purpose. Phones are kept in the designated area. Any pictures taken of children by the school will be in accordance to the School Mobile phone and Camera Procedures published September 2024. Staff will not:

- take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse)
- make audio recordings of a child's disclosure.

Positions of Trust and Ethical Conduct: As a result of our knowledge, position, and/or the authority invested in their role, all our staff are in positions of trust. A member of staff can be described as in a position of power or influence because of their role. It is vital for all staff to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship. Staff are expected to ensure that while there is an unequal balance of power, staff have a responsibility to ensure that this is not used for personal advantage or gratification. Staff will always maintain appropriate professional boundaries and avoid behaviour which could be misinterpreted by others. We expect all staff to report and record any incident with this potential. Staff should not:

- use their position to gain access to information for their own advantage and/or a pupil's or family's detriment;
- use their power to intimidate, threaten, coerce or undermine students;
- use their status and standing to form or promote relationships with students which are of a sexual nature, or which may become so.

Abuse of a position of trust and inappropriate relationships with school students: Sexual relationships or sexual contact with any pupil, or encouraging a relationship to develop in a way which might lead to a sexual relationship, or any relationship just considered inappropriate with any pupil at the school, is a grave breach of trust that will usually lead to disciplinary action and may also lead to criminal prosecution. It is a criminal offence to have any sexual relationship with any school pupil under the age of 18. Whilst not a criminal offence, it is a breach of this Code and considered to be gross misconduct to have a sexual relationship with any pupil of this school, even if over the age of 18.

Sexual Contact: All adults should clearly understand the need to maintain appropriate boundaries in their contacts with students. Intimate or sexual relationships between children/young people and the adults who work with them will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.

Staff must not:

- have sexual relationships with students;
- have any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e., verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact;
- make sexual remarks to, or about, a child/young person;
- discuss their own sexual relationships with or in the presence of students.

Any sexual activity between an adult and the child or young person with whom they work may be regarded as a criminal offence and will always be a matter for disciplinary action. All children and young people are protected by specific legal provisions in this respect regardless of whether the child or young person consents or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child and manipulate that relationship so sexual abuse can take place. Adults should be aware that consistently conferring inappropriate special attention and favour upon a child might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behaviour. Staff should:

- ensure that their interactions with students clearly take place within the boundaries of a respectful professional relationship;
- take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanor and language all

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require care and thought, particularly when members of staff are dealing with adolescent boys and girls.

Inappropriate relationships with students at another school: Forming relationships with children or young people, who are students of this school or students at another school, will be a criminal offence if they are under 16 but may also be a criminal offence if under the age of 18 and will be regarded as gross misconduct. Such behaviour tends to bring the school into disrepute and gives rise to concern that the staff involved cannot be trusted to maintain professional boundaries with students at the school. Whilst not necessarily a criminal offence, the school considers it inappropriate for staff to form inappropriate relationships with a pupil of any school, irrespective of their age.

Concerns and allegations against staff (including supply teachers, third-party & self-employed staff volunteers and contractors, and adults from organisations or individuals using the school premises)

If a member of staff is concerned about the behaviour of a person working or volunteering at the school (including contractors), they will follow the agreed procedure set out in the flowchart 'Allegation against adults', displayed in the staff room. See Safeguarding and Child Protection Policy (September 2024).

Rikkyo School operates a 'low-level' concerns policy in accordance with KCSIE. 'Low-level' refers to behaviour that is: inconsistent with expectations set out in this policy, including inappropriate conduct outside of work, and/or does not meet the allegations threshold, or is otherwise not considered serious enough to consider a referral to the LADO.

All concerns, no matter how small, will be shared responsibly and with the right person, recorded and dealt with promptly and appropriately. This will serve our commitment to create and embed a culture of openness, trust, and transparency in which the school's values and expected behaviour set out in this policy are constantly lived, monitored and reinforced by all staff.

'Low-level' concerns could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

We also encourage all staff to self-refer to their line manager or DSL where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Whistleblowing

All staff and volunteers are expected and encouraged to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime. All staff within the school who wish to raise an issue relating to the organisation with someone in confidence can use the following whistleblowing procedures:

In the first instance, concerns about poor or unsafe practice within must be raised with: the Headmaster

Where a staff member feels unable to raise an issue with the Headmaster or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- The Bursar – bursar@rikkyo.co.uk
- A member of the UK Board of Governors via the Clerk to the Governors: clerk@rikkyo.co.uk
- The [NSPCC whistleblowing helpline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 or email: help@nspcc.org.uk if:
 - they think the concern will not be dealt with properly or
 - may be covered up or
 - if they raised a concern but it has not been acted upon or if they are worried they are being treated unfairly.

Training

All members of staff and volunteers have read and signed to confirm they understand this Staff Behaviour Policy.

Induction: The welfare of all children on roll is of paramount importance. All staff including volunteers are informed of this policy at induction and given the chance to question and discuss the expectations set out.

Rikkyo School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential

Staff support: Work in schools is both rewarding and demanding. We support staff by prioritising time to discuss the challenges of their role linked to any aspect of this Staff Behaviour Policy with their line manager and seek further support as appropriate.

Monitoring and review

This policy is reviewed annually or earlier as required by changes to legislation or statutory guidance.